NOTHERN DIVISION

Case 1:14-cv-03501-CCB Document 40 Filed 03/11/15 Page 1 of 3

Ronald Lee Wright (Pro se) 2101 Searles Road Baltimore, Maryland 21222

Plaintiff

* Civil No: CCB-14-CV-03501 v.

GARY MAYNARD, et al.

Defendant(s)

MOTION TO ENTRY DEFAULT

Pursuant to Rule 55. Default; Default Judgment of the Federal Rules of Civil Procedure, Plaintiff, Ronald Lee Wright requests an entry of default against Defendants, Jackie Arthur, Joseph Clocker, Earnest Eley, Jr. Kathleen Rebbert Franklin, Donald Hall, Gary Maryard, Paul McGowan, Thomas McGrain, Joshua M. Sharfstein and Patricia Vale and states as follows: 1.

- 1. On November 7, 2014, Plaintiff filed a Complaint with this Court against Jackie Arthur, Joseph Clocker, Earnest Eley, Jr. Kathleen Rebbert Franklin, Donald Hall, Gary Maryard, Paul McGowan, Thomas McGrain, Joshua M. Sharfstein and Patricia Vale.
- 2. All Defendants have been formally served with the Complaint. The Summons' for all Defendants were returned executed and filed with this Court.
- 3. Counsel for defendants requested an extension of time that was approved by the courts.
- 4. Answers to the Complaint from defendants Jackie Arthur, Joseph Clocker, Earnest Eley, Jr. Kathleen Rebbert Franklin, Donald Hall, Gary Maryard, Paul McGowan, Thomas McGrain, Joshua M. Sharfstein and Patricia Vale were due by February 20, 2015
- 5. To date, Defendants have not answered the Complaint or contacted Plaintiff's to seek another extension of time to answer the Complaint.
- 6. Defendants are making a motion to dismiss without providing the Plaintiff with all answers to the complaint.

WHEREFORE Plaintiff respectfully requests Entry of Default by the Clerk of the Court against Jackie Arthur, Joseph Clocker, Earnest Eley, Jr. Kathleen Rebbert Franklin, Donald Hall, Gary Maryard, Paul McGowan, Thomas McGrain, Joshua M. Sharfstein and Patricia Vale.

Respectfully submitted

Ronald Wright Plaintiff (pro se)

2101 Searles Road

Baltimore, Maryland 21222

410-288-1399

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished by certified U.S. Mail, this 4th of March 2015, to:

Baltimore County, Maryland
Michael Field Counsel for Defendants
400 Washington Ave Rm 148
Towson, MD 21204-4610

Susan Howe Baron Counsel for Division of Parole and Probation

Kathleen Morse Counsel for DHMH

Attorney General Of Maryland

St. Paul Plaza 200 St Paul Place, Baltimore, Maryland 21202

Respectfully Submitted

March 4, 2015

Ronald Lee Wright

2101 Searle road

Baltimore, Maryland 21222

410-288-1399